

## **II. REMARKS**

1. Claims 1-13 remain in the application.
2. Applicants respectfully submit that claims 1, 5-9, and 11-13 are patentable over the combination of Green (WO 98/10571 in view of Weadon et al. (US 5,999,827, "Weadon") and Petrella et al. (US 5,745,566, "Petrella") under 35 USC 103(a).

The combination of Green, Weadon, and Petrella at least fails to disclose or suggest:

a user interface, including at least a first keypad and a display, wherein a portion of the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part, and that said replacement cover includes at least keys for applications and changing the functionality of the first keypad,

as recited by claim 1.

The combination of Green, Weadon, and Petrella also fails to disclose or suggest:

changing the user interface by removing the second part and placing a replacement cover in a detachable manner in connection with the housing and in place of the second part, and

equipping the replacement cover with at least means for providing keys for applications and changing the functionality of the first keypad,

as recited by claim 9.

In addition, the combination of Green, Weadon, and Petrella fails to disclose or suggest:

means for providing user interface functions, including at least a first keypad and a display, wherein a portion of the user interface functions are arranged to be

replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part, and that said replacement cover includes at least means for providing keys for applications and changing the functionality of the first keypad,

as recited by claim 13.

2.1 Applicant notes that on page 2 of the present action the Examiner refers to clauses that are no longer part of the present claims. For example, the Examiner continues to argue that Green shows a communication device "wherein the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, substantially parallel to the second part, onto or in place of the second part... (Emphasis added). In contrast, present claim 1 states that "a portion of the user interface is arranged to be replaceable by placing a replacement cover in a detachable manner in connection with the housing, wherein the second part is adapted to be removed before inserting the replacement cover in place of the second part,..."

Green fails to disclose or suggest replaceable user interface functions. In Green, a keypad adaptor is mounted on a conventional keypad of a phone that includes keys which are preferably larger and more spaced apart than the keys of the conventional keypad. A portion of the user interface that includes a first keypad and a display, as recited by the present claims is not replaced, the adapter is simply mounted on a conventional keypad.

The present Office Action correctly points out that Green fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad.

The present Office Action also correctly points out that Green fails to disclose or suggest a second part of the housing adapted to be removed before inserting a replacement cover in place of the second part.

2.2 Weadon discloses a radiotelephone having a primary keypad and a movable flip cover that contains a secondary keypad. The flip cover is movable between a closed position wherein at least a portion of a primary keypad is covered, and an open position wherein the primary keypad is uncovered. When the flip cover is in a closed position and when the secondary keypad key is depressed by a user, the depressed key in-turn depresses a respective primary keypad key to perform a radiotelephone function (see the Abstract). The radiotelephone is capable of detecting flip cover position and changing a primary keypad key first function to a different second function in response to movement of the flip cover (see column 1, lines 63-67).

The present Office Action on page 3 correctly points out that the combination of Green and Weadon, fails to disclose or suggest removing the second part and placing a replacement cover in a detachable manner in connection with the housing and in place of the second part.

Applicant submits that Weadon, like Green also fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad. Weadon's movable flip cover is not a replacement cover, it is always present on the radiotelephone.

2.3 Petrella relates to a portable communication device having removable escutcheon elements. In the background section of the disclosure it is stated that one known communication device design attempts to provide an easily changeable escutcheon. This design permits the user to alter the appearance of the portable telephone after manufacture or purchase. The portable telephone includes a removable, snap-file escutcheon and a housing. The escutcheon includes tabs disposed radially around the perimeter of the escutcheon which fit into corresponding slots on the housing (see column 2, lines 7-14). The escutcheon of Petrella does not include keys for applications and changing the functionality of the first keypad.

Thus, Petrella fails to disclose or suggest a replacement cover that includes at least keys for applications and changing the functionality of the first keypad.

In addition, Petrella also fails to disclose or suggest a second part of the housing adapted to be removed before inserting the replacement cover in place of the second part. The present claims clearly define the replacement cover as including at least keys for applications and changing the functionality of the first keypad. The escutcheon of Petrella is only able to be replaced by another escutcheon and is not able to be replaced by a cover that provides keys.

At least for these reasons, Applicants submit that the combination of Green, Weadon, and Petrella fails to disclose all the features of independent claims 1, 9, and 13 and dependent claims 5-8, 11 and 12. Therefore, these claims are patentable over the combination of Green, Weadon, and Petrella.

3. Applicants respectfully submit that claims 2-4, and 10 are patentable over the combination of Green and Weadon, further in view of Fuhrmann et al. (WO 97/32423, "Fuhrmann").

Claims 2-4 and 10 depend from claims 1 or 9.

Fuhrmann fails to supply the features missing from the combination of Green and Weadon argued above.

Fuhrmann only relates to replacing a cover with a different cover while the functions remain the same. Fuhrmann only discloses a cover that has an opening for a display and for keys but has no display or keys itself.

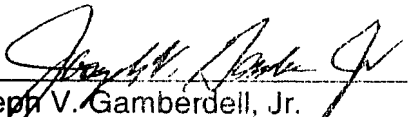
Thus, the combination of Green, Weadon and Fuhrmann fails to disclose or suggest changing the user interface by removing the second part and placing a replacement cover in a detachable manner in connection with the housing and in place of the second part, and equipping the replacement cover with at least means for providing keys for applications and changing the functionality of the first keypad.

At least for these reasons, claims 2-4, and 10 are patentable over the combination of Green, Weadon and Fuhrmann.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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28 February 2007  
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